STATE BUILDING CODE INTERPRETATION NO. I-19-03

November 19, 2003

The following is offered in response to your November 17, 2003 letter to me in which you seek an official interpretation of the requirements of Section 114.3 of the BOCA National Building Code/1996 portion of the 1999 State Building Code as amended by the State of Connecticut.

Question 1: "For the purpose of determining 'threshold limit' in an Educational Use Group where both Educational and Assembly spaces exist, as separated uses, should the occupancy of 1,000 persons be determined as if both educational and assembly spaces are occupied simultaneously or as non-simultaneous occupancy? Example: Educational spaces have a design occupancy of 600 persons and the Assembly spaces have a design occupancy of 800 persons. If in this example threshold limit is determined by the total occupancy (1,400 persons) simultaneously, then we have exceeded the threshold limit, but if the threshold limit is determined non-simultaneously then neither occupancy has exceeded the threshold limit."

Answer 1: The threshold limit is determined by the total occupancy of the building assuming that all occupiable spaces are occupied simultaneously. In the example you present, the building exceeds the threshold limit for occupancy.

Question 2: "If a facility is separated by fire walls, as defined in the code, and the occupancy in each fire area does not exceed 1,000 persons, but the total does exceed 1,000 persons, will threshold limits apply?"

Answer 2: Yes. Since the language of Section 114.3 of the BOCA National Building Code/1996 portion of the 1999 State Building Code applies threshold limits to "any structure", the use of fire walls to separate a structure into multiple buildings does not affect the threshold limit calculations. Since the structure you present has a total occupancy that exceeds 1000 people, the building is subject to the requirements of the code for structures that exceed the threshold limit.